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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re:

Circuit City Stores, Inc.,
et al.,

Debtors.

Chapter 11

Case No. 08-35653 (KRH)

Jointly Administered

**RESPONSE OF COMPASS GROUP USA, INC. TO DEBTORS' NINTH OMNIBUS
OBJECTION TO CERTAIN (I) LATE CLAIMS AND (II) LATE 503(B)(9) CLAIMS**

COMES NOW Compass Group USA, Inc. ("Compass") and files this response to the Ninth Omnibus Objection to Certain (I) Late Claims and (II) Late 503(b)(9) Claims (the "Objection") filed by the above-captioned debtors (the "Debtors"). In support hereof, Compass states as follows:

1. On August 13, 2004, Compass and the Debtors entered into a Food Services Agreement wherein Compass provided food services and management of food services operations for the Debtors utilizing equipment and personnel of Compass.

2. On January 30, 2009, Compass timely filed a proof of claim, claim #10159, in the amount of \$215,502.68 (the "Original Claim). The Original Claim included Compass equipment held by the Debtors that was valued at \$95,801.97.

3. Subsequent to filing the Original Claim, the Debtors returned the equipment to Compass. Accordingly, on May 5, 2009, Compass filed an amended claim (claim #12877) in the amount of \$120,000.71, which reflects a \$95,801.97 deduction from the amount of the Original Claim (the "Amended Claim"). A copy of the Amended Claim is attached hereto as Exhibit A.

4. The Amended Claim was filed to amend the Original Claim and states that it is amending the Original Claim on the proof of claim form. As an amended claim, its date of filing relates back to the date of filing of the Original Claim, which was filed before the claims bar date.

WHEREFORE, Compass prays that the Amended Claim be allowed and that the Court grant such other and further relief as it deems appropriate.

Dated this 24th day of June, 2009.

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CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of June, 2009, I caused a copy of the foregoing to be served by electronic means on the "2002" and "Core" lists and through the ECF System.

/s/ Lisa P. Sumner
Lisa P. Sumner